

00-75-CD
GREGORY E. CLINE et ux -vs- ROAD RUNNER DELIVERY SERVICE INC. et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

(u) GREGORY E. CLINE and (d1) DIANE
CLINE, husband and wife,

Plaintiff

vs.

(u) ROAD RUNNER DELIVERY
SERVICE INC. and (d3) JERRY GETER,
JR.,

Defendant

No. 00-75-60

**PRAECIPE TO ISSUE A WRIT OF
SUMMONS IN A CIVIL ACTION**

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

(814) 696-6580

FILED

JAN 20 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No.:

Plaintiffs

-VS-

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants

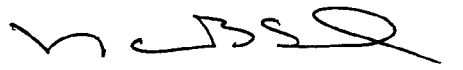
PRAECIPE FOR WRIT OF SUMMONS
IN A CIVIL ACTION

TO: William Shaw, Prothonotary

Kindly issue a Writ Of Summons In A Civil Action in the within matter directed against the Defendant, Road Runner Delivery Service, Inc. of 3152 B, Southwest Blvd., Tulsa, Oklahoma 74133 and Defendant, Jerry Geter, Jr., of 4638 South St. Louis Avenue, Tulsa, Oklahoma 74105 arising out of a motor vehicle collision occurring in Sandy Township, Clearfield County, Pennsylvania on March 12, 1998.

EDGAR SNYDER & ASSOCIATES, LLC

By



Nathaniel B. Smith
Attorney for Plaintiffs

FILED

2000

JAN 20 2000

WILLIAM A. SHAW
PROTHONOTARY

Writ to E. Supply atty

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION

GREGORY E. CLINE and DIANE

CLINE, husband and wife,

Plaintiff(s)

S U M M O N S

NO: 00-75-CD

vs.

ROAD RUNNER DELIVERY SERVICE, INC.

and JERRY GETER, JR.

Defendant(s)

To the above named Defendant(s) you are hereby notified
that the above named Plaintiff(s), has/have commenced a Civil Action
against you.

Date January 20, 2000

William A. Shaw, Prothonotary

Issuing Attorney:

Edgar Snyder and Associates, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No. 00-75-CD

Plaintiff

COMPLAINT IN CIVIL ACTION

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY GETER,
JR.,

Defendant

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

(814) 696-6580

FILED

JAN 28 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No.: 00-75-CD

Plaintiffs

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY
GETER, JR.,

Defendants

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE OR KNOW A LAWYER, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

LAWYER REFERRAL SERVICE -

Court Administrator's Office
1 North Second Street
Clearfield, PA 16830

Telephone (814) 765-2641, Ext: 50

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No.: 00-75-CD

Plaintiffs

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY
GETER, JR.,

Defendants

COMPLAINT IN CIVIL ACTION

AND NOW, come the Plaintiffs Gregory E. Cline and Diane Cline, husband and wife, by and through their attorneys EDGAR SNYDER & ASSOCIATES and NATHANIEL B. SMITH, ESQUIRE to make complaint against the Defendants Road Runner Delivery Service, Inc. and Jerry Geter, Jr., upon cause whereof the following is a statement:

1. Plaintiffs Gregory E. Cline and Diane Cline, husband and wife, are adult individuals who reside at 1360 Treasure Lake, DuBois, Clearfield County, Pennsylvania 15801.
2. Defendant Road Runner Delivery Service, Inc., is a corporation registered in the State of Oklahoma with a principal place of business located at 3152B Southwest Boulevard, Tulsa, Oklahoma 74133.
3. Defendant Jerry Geter, Jr. is an adult individual who resides at 4638 South St. Louis Avenue, Tulsa, Oklahoma 74105.

4. At all pertinent times, Defendant Jerry Geter, Jr. was the operator of a tractor trailer owned and operated on behalf of Defendant Road Runner Delivery Service, Inc. As such, Defendant Jerry Geter, Jr. was acting as the agent, servant and/or employee of Defendant Road Runner Delivery Service, Inc. acting on or about the business of Road Runner Delivery Service, Inc. and acting under the direct supervision and control of Road Runner Delivery Service, Inc.

5. The accident which is the subject of this lawsuit occurred on March 12, 1998 on Interstate 80 in Sandy Township, Clearfield County, Pennsylvania at approximately 8:30 a.m.

6. At the aforesaid time and place, Plaintiff Gregory E. Cline had been operating a tractor trailer rig generally in a westwardly direction on Interstate 80. In doing so, Plaintiff was operating said vehicle in a proper, careful and lawful manner. Further, Plaintiff Gregory E. Cline was operating said tractor trailer rig within the course and scope of his employment with Conway Transportation Services, Inc.

7. Likewise, at the above-mentioned time and place, Defendant, Jerry Geter, Jr. was operating a tractor trailer rig within the course and scope of his employment with Defendant Road Runner Delivery Service, Inc., in a westwardly direction on Interstate 80.

8. At the above-mentioned time and place, Plaintiff Gregory E. Cline was lawfully and carefully stopped for traffic conditions ahead on Interstate 80, when his tractor trailer rig was struck violently from behind by the tractor trailer rig driven by Defendant Jerry Geter, Jr., causing serious, severe and possibly permanent injuries to Plaintiff Gregory E. Cline.

9. At the time aforesaid, the Defendant Jerry Geter, Jr. while acting as an agent, servant and employee of Defendant Road Runner Delivery Service, Inc., was careless, negligent and reckless in the following particulars:

- a. In failing to keep a proper lookout;
- b. In operating his vehicle at an excessive rate of speed;
- c. In traveling at a speed too fast for conditions;
- d. In failing to exercise due care and caution under the circumstances;
- e. In failing to bring the vehicle which he was operating to a stop within the assured cleared distance ahead;
- f. In failing to have said vehicle under proper and adequate control at the time;
- g. In being inattentive in failing to maintain a sharp lookout of the road and the conditions of traffic surrounding him;
- h. In failing to stop, turn or take other appropriate action so that the collision with the tractor trailer rig operated by Plaintiff could be avoided;
- i. In operating his vehicle without due regard for the rights, safety and position of the Plaintiff herein;
- j. In violating the Pennsylvania Motor Vehicle Code Section pertaining to following too close as set forth in 75 Purdons Section 3310;
- k. In violating the Pennsylvania Motor Vehicle section pertaining to driving vehicle at safe speed as set forth in 75 Purdons Section 3361;

10. The negligence of the Defendant Jerry Geter, Jr. as set forth above was a substantial, direct and proximate cause of the collision.

11. Defendant Road Runner Delivery Service, Inc. was also negligent, careless and reckless in its own right and such negligence, carelessness and recklessness was the proximate cause of the aforesaid accident and resulting injuries to the Plaintiff as follows:

- a. In failing to adequately instruct its employee, Jerry Geter, Jr., on safe and proper operation of its vehicle;
- b. In having employees who are inexperienced or incompetent to drive vehicles such as Jerry Geter, Jr. was driving on the day of the accident;
- c. In failing to inspect the vehicle operated by Jerry Geter, Jr. to insure its roadworthiness;
- d. In permitting an operator to drive its vehicle when it knew or should have known he was not competent to operate a vehicle of the type and kind which Jerry Geter, Jr. was operating at the time of the accident;
- e. In permitting Jerry Geter, Jr. to operate said vehicle in violation of applicable regulations relevant to the amount of time an operator is permitted to drive;
- f. In failing to properly supervise its operators and Jerry Geter, Jr., in particular, in compliance with applicable regulations and the Pennsylvania Motor Vehicle Code; and,
- g. In permitting its drivers to operate its vehicles while fatigued or not competent to operate.

Count I

**Plaintiff Gregory E. Cline vs. Defendants Road Runner Delivery Service, Inc.
and Jerry Geter, Jr.**

12. Plaintiff Gregory E. Cline hereby incorporates paragraphs 1 through 11 of the foregoing as if the same were fully set forth at length herein.

13. As a result of the aforesaid negligence of the Defendant, Jerry Geter, Jr., jointly and severally with the Defendant Road Runner Delivery Service, Inc., Plaintiff Gregory E. Cline suffered the following severe and serious injuries, some or all of which may be permanent in nature:

- a. Cervical strain/sprain;
- b. Thoracic strain/sprain;

- c. Lumbar strain/sprain;
- d. Contusion posterior scalp;
- e. Herniated disc L5-S1;
- f. Anterior bulging at L5-S1;
- g. Compression fractures at L5 and S1;
- h. S1 radiculitis;
- i. Chronic low back pain with sacroiliac dysfunction;
- j. Severe shock, strain or sprain of the nerves, muscles, tissues, ligaments and vessels of the musculoskeletal system and;
- k. Other serious and severe injuries, the exact nature of which are unknown to the Plaintiff at this time.

14. As a result of his aforesaid injuries, Plaintiff Gregory E. Cline has been damaged as follows:

- a. He has suffered and will continue to suffer great pain, inconvenience, embarrassment, mental anguish and loss of enjoyment of life's pleasures;
- b. He has suffered a loss of income;
- c. His earning power and capacity have been reduced and may be permanently impaired;
- d. His general health, strength and vitality have been impaired;
- e. He has suffered a physical disability which may be permanent in nature;
- f. Plaintiff has lost and will lose time from his gainful employment and usual avocations;

- g. Plaintiff has been and may in the future be unable to fully engage in his usual duties and activities for an extensive period of time;
- h. He has incurred medical expenses which have or may in the future exceed the sums recoverable under the limits of the Pennsylvania Motor Vehicle Financial Responsibility Law;
- i. He has incurred medical expenses and wage loss which have been paid through workman's compensation under Pennsylvania law and a subrogation reimbursement lien pertains thereto.

WHEREFORE, Plaintiff Gregory E. Cline, demands judgement against the Defendants, Road Runner Delivery Service, Inc. and Jerry Geter, Jr., jointly and severally, in an amount in excess of the jurisdictional limits of arbitration of the Court of Common Pleas of Clearfield County.

Count II
Plaintiff Diane Cline vs. Defendant Road Runner Delivery
Service, Inc. and Jerry Geter, Jr.

15. Plaintiff Diane Cline hereby incorporates paragraphs 1 through 14 of the foregoing as if the same were fully set forth at length herein.

16. Plaintiff Diane Cline is the wife of the Plaintiff Gregory E. Cline, who was injured by the afore stated negligence of the Defendants Road Runner Delivery Service, Inc. and Jerry Geter, Jr.

17. Solely and as a direct and proximate result of the carelessness, negligence and recklessness of the Defendant, Road Runner Delivery Service, Inc. and Jerry Geter, Jr., the Plaintiff Diane Cline, has sustained the following damages:

- a. Plaintiff has suffered a loss of consortium; and
- b. The Plaintiff has suffered great inconvenience and loss of services which were provided by husband Plaintiff.

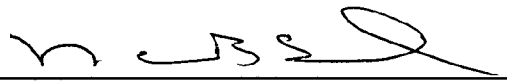
WHEREFORE, Plaintiff Diane Cline demands judgement against the Defendants, Road Runner Delivery Service, Inc. and Jerry Geter, Jr., jointly and severally, in an amount in excess of the jurisdictional limits of arbitration of the Court of Common Pleas of Clearfield County.

JURY TRIAL IS DEMANDED.

Respectfully submitted,

EDGAR SNYDER & ASSOCIATES, LLC

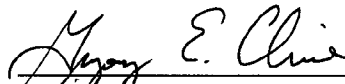
By: _____



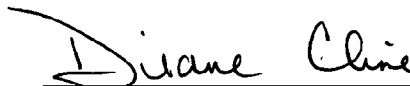
Nathaniel B. Smith, Esquire
19 North Juniata Street, PO Box 536
Hollidaysburg, PA 16648

VERIFICATION

We, Gregory E. Cline and Diane Cline, Plaintiffs herein, hereby verify that the averments of fact contained in the foregoing Complaint in Civil Action are true and correct and based upon our personal knowledge, information or belief. We understand that these averments of fact are made subject to the penalties of 18 Purdons Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.



Gregory E. Cline



Diane Cline

Date:

1-22-00

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Complaint in Civil Action was served on all Counsel listed below, by Certified Mail, Return Receipt Requested, postage prepaid, on this 27th day of January, 2000:

Road Runner Delivery Service, Inc.
3152B Southwest Boulevard
Tulsa Oklahoma 74133

Jerry Geter, Jr.
4638 South St. Louis Avenue
Tulsa Oklahoma 74105



Nathaniel B. Smith
Attorney for Plaintiffs

FILED

JAN 28 2000

11:30 AM
William A. Shaw
Prothonotary

200

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No. 00-75-CD

Plaintiff

vs.

**AFFIDAVIT OF SERVICE OF
DEFENDANT ROAD RUNNER DELIVERY
SERVICE, INC.**

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY GETER,
JR.,

Defendant

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

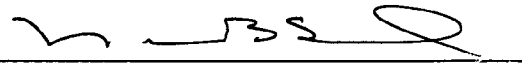
(814) 696-6580

FILED

FEB 09 2000

William A. Shaw
Prothonotary

4. As evidenced by the receipt, attached hereto as Exhibit A, Defendant was served with a true and correct copy of the Writ of Summons in a Civil Action and copy of the Complaint in Civil Action on or about February 2, 2000.



Nathaniel B. Smith
Attorney for Plaintiff

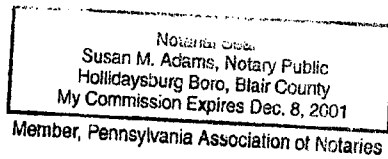
Sworn to and subscribed

before me, this 8th

day of February, 2000.

Susan M. Adams

Notary Public

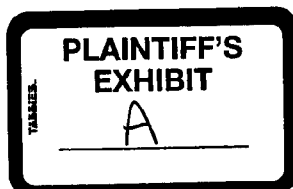


SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Received by (Please Print Clearly) <u>Chestina McGee</u> B. Date of Delivery <u>2-2-00</u></p> <p>C. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>Road Runner Delivery Service, Inc. 3152 B Southwest Blvd. Tulsa Oklahoma 74133</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Copy from service label)</p> <p><u>Z 292 422 307</u></p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789



FILED

FEB 09 2000

01/15/10 CC

William A. Shaw

Prothonotary

WAS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

00-75-CD
No.: 75 CD 2000

Type of Case: Civil Action

JURY TRIAL DEMANDED

Type of Pleading:
PRAECIPE FOR ENTRY OF
APPEARANCE

Filed on Behalf of Defendant,
ROAD RUNNER DELIVERY SERVICE,
INC.

Counsel of Record for this
Party: JOHN W. BLASKO

Court I.D. No.: 06787

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

811 University Drive
State College, PA 16801
(814) 238-4926

Counsel of Record for
Adverse Party:
NATHANIEL B. SMITH

Dated:

February 10, 2000

FILED

FEB 11 2000

William A. Shaw
Prothonotary

Dated

Road Runner Delivery Service, Inc.

FILED

FEB 11 2009
② 157110 CC
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE
CLINE, husband and wife,

No. 00-75-CD

Plaintiff

**AFFIDAVIT OF SERVICE OF
DEFENDANT JERRY GETER, JR.**

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY GETER,
JR.,

Filed on behalf of:
Plaintiffs

Defendant

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

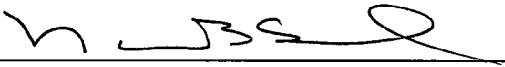
(814) 696-6580

FILED

FEB 15 2000

William A. Shaw
Prothonotary


4. As evidenced by the receipt, attached hereto as Exhibit A, Defendant was served with a true and correct copy of the Writ of Summons in a Civil Action and copy of the Complaint in Civil Action on or about February 9, 2000.


Nathaniel B. Smith
Attorney for Plaintiff

Sworn to and subscribed

before me, this 11th

day of February, 2000.


Notary Public

Notarial Seal
Dolores Jane Leedy, Notary Public
Hollidaysburg Boro, Blair County
My Commission Expires Nov. 5, 2001
Member, Pennsylvania Association of Notaries

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jerry Geter, Jr.
4638 ~~South~~ St. Louis Ave.
Tulsa, Oklahoma ~~74105~~

NORTH 74126

2. Article Number (Copy from service label)
Z 292 422 308

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X Jerry Geter ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

PLAINTIFF'S
EXHIBIT

A

FILED

FEB 15 2000

M/11/01/2000

William A. Shaw

Prothonotary

Feb

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading:
) PRAECIPE FOR ENTRY OF
) APPEARANCE

) Filed on Behalf of Defendant,
) JERRY GETER, JR.

) Counsel of Record for this
) Party: JOHN W. BLASKO

) Court I.D. No.: 06787

) RICHARD K. LAWS
) Court I.D. No. 82369

) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.

) 811 University Drive
) State College, PA 16801
) (814) 238-4926

) Counsel of Record for
) Adverse Party:
) NATHANIEL B. SMITH

Dated: February 16, 2000

FILED

FEB 17 2000

William A. Shaw
Prothonotary

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JURY TRIAL DEMANDED

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JOHN BLACK

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Dated: February 16, 2000

;

Attorney for Defendant
Road Runner Delivery Service, Inc.

FILED

FEB 17 2000

11:29 AM
William A. Shaw
Prothonotary
K24

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading: Answer and New Matter
) on behalf of Defendants, Road Runner
) Delivery Service, Inc. and Jerry Geter, Jr.
) to Plaintiffs' Complaint

) Filed on Behalf of Defendants,
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these
) Parties: JOHN W. BLASKO

) Court I.D. No.: 06787

) RICHARD K. LAWS
) Court I.D. No. 82369

) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.

) 811 University Drive
) State College, PA 16801
) (814) 238-4926

) Counsel of Record for
) Adverse Party:
) NATHANIEL B. SMITH

Dated: 3/1/00

FILED

MAR 02 2000

William A. Shaw
Prothonotary

Dated: 3/1/00

3. Denied as stated. Although it is admitted that Defendant Jerry Geter, Jr. is an adult individual residing in the State of Oklahoma, his address should be properly indicated as follows: 4638 North Saint Louis Avenue, Tulsa, Oklahoma, 74126.

4. The averments of paragraph 4 of Plaintiffs' Complaint are responded to as follows. It is admitted that on March 12, 1998, Defendant Jerry Geter, Jr. was driving a tractor trailer that was owned and operated on behalf of Defendant Road Runner Delivery Services, Inc. It is further admitted that Defendant Jerry Geter, Jr. was an employee of Defendant Road Runner Delivery Service, Inc. at the time of the underlying incident on March 12, 1998. The remaining averments of paragraph 4 of Plaintiffs' Complaint constitute conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that the averments of paragraph 4 go beyond that set forth herein, they are denied pursuant to Pa.R.C.P. 1029(e).

5. The averments of paragraph 5 of Plaintiffs' Complaint are responded to as follows. It is admitted that a multi-car collision occurred in or around the westbound lane of Interstate 80, mile marker 103, at approximately 8:30 a.m. on March 12, 1998. Although generally situated in Sandy Township, Clearfield County, the precise location and/or events of this collision will be further developed through discovery as this case proceeds.

6. Admitted in part and denied in part. It is admitted that, the investigation conducted to date, reveals that on March 12, 1998, Plaintiff Gregory E. Cline was operating his vehicle in the westbound lane of Interstate 80, in Sandy Township, Clearfield County, Pennsylvania, at or near mile marker 103 near Dubois exit 17. The allegation that Plaintiff was operating said vehicle in a proper, careful and lawful manner is denied and strict proof thereof demanded at trial. The allegation that Plaintiff was operating said vehicle within the course and scope of his employment with Conway Transportation Services, Inc. is denied, in that after reasonable investigation Defendants are without knowledge or information sufficient to form

belief as to the truth of such allegations. Strict proof thereof is demanded at trial. To the extent that the averments of paragraph 6 go beyond that which is stated herein, they are further denied in accordance with Pa.R.C.P. 1029(e).

7. The averments of paragraph 7 are admitted to the extent that the precise time and location of the incident in question will be more specifically developed through the discovery to be completed in this case. The remaining averments of paragraph 7 of Plaintiffs' Complaint constitute conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that the averments of paragraph 7 go beyond that set forth herein, they are denied pursuant to Pa.R.C.P. 1029(e).

8. Denied and/or denied as stated. The averments of paragraph 8 contain statements of Plaintiffs' legal position and/or conclusions of law to which no response is necessary. To the extent that a response is deemed necessary, the averments of paragraph 8 are denied, in that after reasonable investigation, Defendants are without knowledge or information sufficient to form belief as to the truth of said allegations. The allegation that Plaintiff was lawfully and carefully stopped for traffic conditions on the day in question is denied and strict proof thereof demanded at the trial of this matter. To the extent that the averments of paragraph 8 go beyond that set forth herein, they are further denied in accordance with Pa.R.C.P. 1029(e). Strict proof of all denied averments is demanded at the trial of this matter.

9. The averments of paragraph 9 set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that a response is deemed necessary, the averments of paragraph 9(a) through 9(k) are denied pursuant to Pa.R.C.P. 1029(e). It is specifically denied that Defendant Jerry Geter, Jr. and/or Defendant Road Runner

Delivery Services, Inc. was at any time relevant to the Plaintiffs' Complaint careless, negligent and/or reckless in any way and strict proof of such allegations is demanded at the trial of this matter.

10. The averments of paragraph 10 of Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that a response is deemed necessary, the allegations of paragraph 10 are denied pursuant to Pa.R.C.P. 1029(e). Strict proof of such allegations is demanded at the trial of this matter.

11. The averments of paragraph 11 of Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that a response is deemed necessary, the allegations of paragraph 11(a) through 11(g) are denied pursuant to Pa.R.C.P. 1029(e). It is specifically denied that, at any time relevant to the Plaintiffs' Complaint, Defendant Road Runner Delivery Services, Inc. was in any way negligent, careless and/or reckless as specified in paragraphs 11(a) through 11(g) of Plaintiffs' Complaint. It is also specifically denied that Defendant Road Runner Delivery Service, Inc. is in anyway causally responsible for any of the Plaintiff's alleged injuries as set forth in Plaintiffs' Complaint. Strict proof of all the denied allegations of paragraphs 11(a) through 11(g) is demanded at the trial of this matter.

Count I
Plaintiff Gregory E. Cline v. Defendants Road Runner Delivery Services, Inc.
and Jerry Geter, Jr.

12. The averments of paragraphs 1 through 11 of the Defendants' Answer and New Matter are incorporated herein as through fully set forth.

13. The averments of paragraph 13 of Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the

extent that a response is deemed necessary, the averments of paragraph 13 (including subparagraphs (a) through (k)) are specifically denied pursuant to Pa.R.C.P. 1029(e). It is further denied that, at any time relevant to the Plaintiffs' Complaint, Defendant Jerry Geter, Jr. and/or Defendant Road Runner Delivery Services, Inc. was in any way negligent and/or causally responsible for any of the alleged injuries that are set forth in the Plaintiffs' Complaint. The averments of paragraph 13 of Plaintiffs' Complaint are further denied, in that after reasonable investigation, the Defendants are without knowledge or information sufficient to form belief as to the truth of the allegations contained therein. Strict proof of all denied allegations is therefore demanded at the trial of this matter.

14. The averments of paragraph 14 of Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that a response is deemed necessary, the allegations of paragraphs 14(a) through 14(i) are denied pursuant to Pa.R.C.P. 1029(e). The averments of paragraphs 14(a) through 14(i) are further denied in that Defendants are without knowledge or information sufficient to form belief as to the truth of such allegations. Strict proof of all denied allegations is demanded at the trial of this matter.

WHEREFORE, Defendants Jerry Geter, Jr. and Road Runner Delivery Services, Inc. request that the Plaintiffs' Complaint be dismissed, with prejudice, and that the Plaintiffs be ordered to reimburse Defendants all costs associated with defending the instant lawsuit.

Count II
Plaintiff Diane Cline v. Defendants Road Runner Delivery Services, Inc.
and Jerry Geter, Jr.

15. The averments of paragraphs 1 through 14 of the Defendants' Answer and New Matter are incorporated herein as through fully set forth.

16. Denied and/or denied as stated. The averments of paragraph 16 of Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent a response is deemed necessary, the averments of paragraph 16 are denied pursuant to Pa.R.C.P. 1029(e) and because the Defendants are without sufficient knowledge or information to form belief as to the status of the Plaintiffs' marital relationship as pled within paragraph 16 of the Plaintiffs' Complaint. It is further denied that Defendant Jerry Geter, Jr. and/or Road Runner Delivery Services, Inc. was, at any time relevant to the Plaintiffs' Complaint, negligent and/or causally responsible for any of the alleged injuries as set forth in Plaintiffs' Complaint. Strict proof of all denied allegations is demanded at the trial of this matter.

17. The averments of paragraph 17 of the Plaintiffs' Complaint set forth conclusions of law and/or statements of Plaintiffs' legal position to which no response is necessary. To the extent that a response is deemed necessary, the averments of paragraphs 17(a) through 17(b) are denied pursuant to Pa.R.C.P. 1029(e) and/or because the Defendants are without information or knowledge sufficient to form belief as to the truth of the averments of paragraphs 17(a) through 17(b). It is further denied that Defendants were, at any time relevant to the Plaintiffs' Complaint, careless, negligent and/or reckless as alleged within the Plaintiffs' Complaint. It is further denied that, at any time relevant to the Plaintiffs' Complaint, Defendants were in any way causally responsible for any of the alleged injuries as set forth in Plaintiffs' Complaint. Strict proof of all denied allegations is therefore demanded at the trial of this matter.

WHEREFORE, Defendants Jerry Geter, Jr. and Road Runner Delivery Services, Inc. request that the Plaintiffs' Complaint be dismissed, with prejudice, and that the Plaintiffs be ordered to reimburse Defendants all costs associated with defending the instant lawsuit.

NEW MATTER

18. The averments of paragraphs 1 through 17 of the Defendants' Answer and New Matter are incorporated herein as through fully set forth.

19. Defendants hereby raise and assert all those defenses and/or limitations on damages available to them by reason of the terms and provision of the Pennsylvania Motor Vehicle Financial Responsibility Law, as amended.

20. To the extent Plaintiff(s) was injured under a policy of insurance wherein he/she had selected the limited tort option, Plaintiffs' claims are barred and/or reduced accordingly.

21. Plaintiff did not sustain a serious bodily injury sufficient to overcome the selection, if any, of the limited tort option.

22. To the extent Plaintiff(s) has incurred any medical expenses, the same may not be pled, proven or recovered in the instant action to the extent that they have been paid or are payable under a policy of insurance.

23. To the extent Plaintiff(s) has sustained any wage loss, the same may not be pled, proven or recovered in the instant action to the extent this same has been paid or is payable under a policy of insurance.

24. Any injuries and damages sustained by Plaintiff(s) are the result of conditions and/or accidents that were beyond and/or out of the control of the Defendant at the time period relevant to the Plaintiffs' Complaint and/or accident at issue.

25. The alleged negligence of Defendants, if any, was not a substantial factor in bringing about any of the damages, injuries and/or harm to the Plaintiff(s) as set forth in the Complaint.

26. All or some of the Plaintiffs' claims may be barred by the affirmative defense of release.

27. All or some of Plaintiffs' claims may be barred by the affirmative defenses of comparative and/or contributory negligence.

28. The motor vehicle accident at issue was caused solely and/or jointly caused by the negligent, reckless and/or careless conduct of other drivers and/or individuals as may be born out through discovery to be conducted in this matter.

29. To the extent that Plaintiff was acting as the agent, servant and/or employee of Conway Transportation Services, Inc., at the time of the underlying accident, Plaintiffs' claims may be barred or reduced.

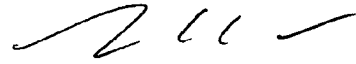
30. Plaintiffs' injuries and/or damages, if any, are the result of medical conditions which pre-existed the accident in question and are unrelated thereto.

WHEREFORE, Defendants Jerry Geter, Jr. and Road Runner Delivery Services, Inc. request that the Plaintiffs' Complaint be dismissed, with prejudice, and that the Plaintiffs be ordered to reimburse Defendants all costs associated with defending the instant lawsuit.

Respectfully submitted,

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

Dated: 311100

By: 

John W. Blasko

I.D. No.: 6787

Richard K. Laws

I.D. No.: 82369

Attorneys for Defendants

811 University Drive

State College, PA 16801

(814) 238-4926

Cline vs. Road Runner et al.

VERIFICATION

RICHARD K. LAWS, being the attorney of record for the Defendants Road Runner Delivery Service, Inc. and Jerry Geter, Jr. verifies that he is authorized to make this verification on behalf of the Defendants in the within action; and that the statements made in the foregoing Answer and New Matter to Plaintiffs' Complaint are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa.C.S.A. §4904, related to unsworn falsification to authority. Defendants reserve the right to file a substantive verification and/or amend this Answer and New Matter.



RICHARD K. LAWS

FILED
m/1:5480
MAR 2 2000
William A. Shaw
Prothonotary
cc
ECL

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

00-75-CD

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading:
) **Certificates of Service**

) Filed on Behalf of Defendants:
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these
) Parties: JOHN W. BLASKO
) I.D. No.: 06787
) RICHARD K. LAWS
) I.D. No. 82369
) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
) 811 University Drive
) State College, PA 16801
) (814) 238-4926

FILED

MAR 07 2000

William A. Shaw
Prothonotary

Richard K. Laws, Esquire
I.D. No. 82369
Attorneys for Defendants
811 University Drive
State College, PA 16801
(814) 238-4926

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and)	
DIANE CLINE, husband and))
wife,)	
)	
Plaintiffs,)	NO. 00-75 CD
)	
vs.)	JURY TRIAL DEMANDED
)	
ROAD RUNNER DELIVERY)	
SERVICE, INC. and JERRY)	
GETER, JR.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Defendants' Request For Production of Documents and Tangible Things Directed to Plaintiffs (Set Two) in the above-referenced matter was mailed by U.S. First Class Mail, postage paid, this 6 day of March, 2000, to the attorney/parties of record:

Nathaniel B. Smith, Esquire
EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street, Suite 1
P.O. Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws, Esquire
I.D. No. 82369
Attorneys for Defendants
811 University Drive
State College, PA 16801
(814) 238-4926

FILED

MAR 07 2010
11:57 AM
William A. Shaw
Prothonotary
C/102

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY CLINE and DIANE No. 75 CD 2000
CLINE, husband and wife,

Plaintiff

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY GETER,
JR.,

Defendant

**NOTICE OF SERVICE OF
INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO
DEFENDANTS**

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

(814) 696-6580

FILED

MAR 13 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY CLINE and
DIANE CLINE, husband
and wife,

No.: 75 CD 2000

Plaintiffs

-VS-

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY
GETER, JR.,

Defendants

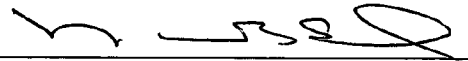
**NOTICE OF SERVICE OF INTERROGATORIES
AND REQUEST FOR PRODUCTION DIRECTED TO DEFENDANTS
ROAD RUNNER DELIVERY SERVICE, INC. and JERRY GETER, JR.**

I hereby certify that on this 10th day of March, 2000, the original Interrogatories Directed To Defendant[s], the original Request For Production, and one (1) copy of the Notice of Service of Interrogatories and Request For Production were mailed by First Class Mail, postage prepaid, to counsel for Defendant[s] at the following address:

Richard K. Laws, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801

EDGAR SNYDER & ASSOCIATES, LLC

By



Nathaniel B. Smith
Attorney for Plaintiffs

FILED

JUN 13 2000

MAY 24 NO CC

WILHELM A. SHAW

PROTHONOTARY

KEB

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,


Defendants.

) No.: 75 CD 2000
)
) Type of Case: Civil Action
)
) JURY TRIAL DEMANDED
)
) Type of Pleading: Defendant Road Runner
) Delivery Service, Inc.'s Answers to
) Plaintiffs' Interrogatories
) Certificate of Service
)
) Filed on Behalf of Defendants:
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.
)
) Counsel of Record for these
) Parties: JOHN W. BLASKO
) I.D. No.: 06787
)
) RICHARD K. LAWS
) I.D. No. 82369
) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
) 811 University Drive
) State College, PA 16801
) (814) 238-4926

FILED

APR 13 2000

William A. Shaw
Prothonotary

By: 
JOHN W. BLASKO
RICHARD K. LAWS
Attorney for Defendants

FILED

APR 13 2000

m/11:55/noon

William A. Shaw

Prothonotary

REY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading: Defendant Jerry Geter's
) Answers to Plaintiffs' Interrogatories
) Certificate of Service

) Filed on Behalf of Defendants:
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these
) Parties: JOHN W. BLASKO
) I.D. No.: 06787

) RICHARD K. LAWS
) I.D. No. 82369
) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
) 811 University Drive
) State College, PA 16801
) (814) 238-4926

FILED

APR 13 2003

William A. Shaw
Prothonotary

By: _____
JOHN W. BLASKO
RICHARD K. LAWS
Attorney for Defendants

FILED

APR 13 2000

MISS/NOCC

William A. Shaw

Prothonotary

WAS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading: Defendants Road Runner
) Delivery Service Inc. and Jerry Geter, Jr's
) Responses to Plaintiffs' Request for
) Production of Documents
) Certificate of Service

) Filed on Behalf of Defendants:
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these
) Parties: JOHN W. BLASKO
) I.D. No.: 06787

) RICHARD K. LAWS
) I.D. No. 82369
) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
) 811 University Drive
) State College, PA 16801
) (814) 238-4926

FILED

APR 13 2000

William A. Shaw
Prothonotary

FILED

APR 13 2009

Missno cc
William A. Shaw
Prothonotary
EKL

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading:

) **Praecipe for Substitution of**
) **Verification**

) Filed on Behalf of Defendants:

) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these

) Parties: JOHN W. BLASKO

) I.D. No.: 06787

) RICHARD K. LAWS

) I.D. No. 82369

) McQUAIDE, BLASKO, SCHWARTZ,

) FLEMING & FAULKNER, INC.

) 811 University Drive

) State College, PA 16801

) (814) 238-4926

FILED

APR 13 2000

William A. Shaw
Prothonotary

(814) 238-4926

VERIFICATION

The undersigned verifies that he/she is authorized to make this verification on behalf of Defendant Road Runner Delivery Service, Inc.; and that the statements made in the foregoing **DEFENDANT ROAD RUNNER DELIVERY SERVICE, INC. ANSWER AND NEW MATTER TO PLAINTIFFS' COMPLAINT** are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. §4904, related to unsworn falsification to authority.

Road Runner Delivery Service, Inc.
Road Runner Delivery Service, Inc.

Michael Crenshaw Vice President
Title/Authority to Sign Verification

FILED

APR 13 2003

MISSOURI

William A. Shaw

Prothonotary

Key

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY CLINE and DIANE
CLINE, husband and wife,

No. 00-75-CD

Plaintiff

REPLY TO NEW MATTER

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY
GETER, JR.,

Filed on behalf of:
Plaintiffs

Defendant

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

(814) 696-6580

FILED

APR 18 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and
DIANE CLINE, husband and
wife,

No.: 00-75 CD

Plaintiffs

-vs-

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY
GETER, JR.,

Defendants

REPLY TO NEW MATTER

AND NOW, come the Plaintiffs Gregory E. Cline and Diane Cline, husband and wife, by and through their attorneys, EDGAR SNYDER & ASSOCIATES, LLC to set forth the following Reply to New Matter as follows:

1. Plaintiffs incorporate their Complaint in Civil Action in its entirety as if the same is set forth herein.
2. Plaintiffs have been advised and therefore aver that the averments contained in paragraph 19 of Defendant's New Matter contain conclusions of law to which no response is required. However, if such a response is deemed necessary, then it is admitted that the terms of the Pennsylvania Motor Vehicle Financial Responsibility Law are applicable hereto.
3. The averments of paragraphs 20 and 21 of Defendants' New Matter are denied. It is denied that the limited tort option is applicable to Plaintiffs' claims despite the fact that Plaintiff was insured under a policy of automobile insurance providing the limited tort option, an exception to limited tort exists under 75 Pa. C.S.A. Section 1705 due to the fact that Plaintiff was the operator of a motor vehicle other than a private passenger motor vehicle and Defendant was operating a motor vehicle registered in another state.

8. Plaintiffs have been advised and therefore aver that the averments contained in paragraph 29 of Defendants' New Matter contain conclusions of law to which no response is required. However, if such a response is deemed necessary, it is specifically denied that Plaintiffs' claims may be barred or reduced under the circumstances that Plaintiff was acting as an agent, servant and/or employee of Conway Transportation Services, Inc. On the contrary, Plaintiffs' claims are increased by the inclusion of a claim for reimbursement of the medical expenses and lost wages paid through worker's compensation benefits.

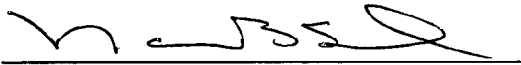
9. The averments of paragraph 30 of Defendants' New Matter are denied. It is specifically denied that Plaintiffs' injuries and/or damages are the result of medical conditions which preexisted the accident in question and are unrelated thereto.

WHEREFORE, Plaintiffs Gregory E. Cline and Diane Cline, husband and wife, demand judgement against the Defendants Road Runner Delivery Service, Inc. and Jerry Geter, Jr., in amounts in excess of the jurisdictional limits of arbitration of the Court of Common Pleas of Clearfield County.

JURY TRIAL DEMANDED.

Respectfully submitted,

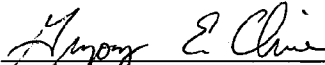
EDGAR SNYDER & ASSOCIATES, LLC

By: 

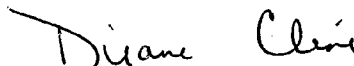
Nathaniel B. Smith, Esquire
19 N. Juniata St., PO Box 536
Hollidaysburg, PA 16648

VERIFICATION

We, Gregory E. Cline and Diane Cline, Plaintiffs herein, hereby verify that the averments of fact contained in the foregoing Reply to New Matter are true and correct and based upon our personal knowledge, information or belief. We understand that these averments of fact are made subject to the penalties of 18 Purdons Consolidated Statutes Section 4904, relating to unsworn falsification to authorities.



Gregory E. Cline



Diane Cline

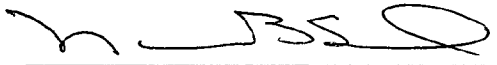
Date:

4-16-00

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Reply to New Matter was served on all Counsel listed below, by First Class Mail, postage prepaid, on this 17th day of April, 2000:

Richard K. Laws, Esquire
McQuaide Blasko
811 University Drive
State College, PA 16801



Nathaniel B. Smith
Attorney for Plaintiffs

FILED

led
APR 18 2000
m 11:15 NOCC
William A. Shaw
Prothonotary

FILED

SEP 25 2000

01/10:40/1cc atty Black
William A. Shaw
Prothonotary

ESB

CP

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

GREGORY CLINE and
DIANE CLINE, husband and
wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

Defendants.

) No.: 75 CD 2000

) Type of Case: Civil Action

) JURY TRIAL DEMANDED

) Type of Pleading: Defendants Road Runner
) Delivery Service, Inc. and Jerry Geter, Jr.'s
) Motion to Compel Answers to Interrogatories
) and Request for Production of Documents

) Filed on Behalf of Defendants:
) ROAD RUNNER DELIVERY SERVICE,
) INC. and JERRY GETER, JR.

) Counsel of Record for these
) Parties: JOHN W. BLASKO
) I.D. No.: 06787

) McQUAIDE, BLASKO, SCHWARTZ,
) FLEMING & FAULKNER, INC.
) 811 University Drive
) State College, PA 16801
) (814) 238-4926

) Nathaniel B. Smith, Esquire

Dated: September 12, 2000

FILED

SEP 13 2000

William A. Shaw
Prothonotary

1. The Plaintiffs instituted this action by causing a Writ of Summons to be issued on January 20, 2000. On January 28, 2000, a Complaint was filed.
2. On March 6, 2000, the Plaintiffs were served with Interrogatories for Answer, as well as a Request for Production of Documents (Set Two).
3. The Interrogatories and Request for Production seek background information on the Plaintiff, the accident, medical history, etc.
4. Over five (5) months have expired, and, the Plaintiffs have not answered the Interrogatories or Request for Production of Documents.
5. On May 24, 2000, Plaintiffs' counsel was contacted requesting that full and complete responses to the Interrogatories and Request for Production be filed, a copy of the letter being attached hereto as Exhibit "A"

6. As of the date of this Motion, the Plaintiffs have failed to provide responses to the discovery or respond to counsel's letter of May 24, 2000.

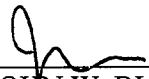
7. The processing of the case is being delayed by the failure to provide responses to the discovery requests.

8. The Defendants are prejudiced in the preparation of a defense to Plaintiffs' claims, in that, the requested information is not provided, which would assist the Defendants in accurately assessing the case, conducting the necessary investigation inquiries and conducting further discovery in preparing a defense to this action.

WHEREFORE, Defendants respectfully request this Honorable Court to grant the Motion to Compel Answers to Defendants' Interrogatories within thirty (30) days, and to make such other Orders that the Court deems appropriate.

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

BY



JOHN W. BLASKO
Counsel for Defendants
811 University Drive
State College, PA 16801
(814) 238-4926

Dated: 9/12/00





McQUAIDE BLASKO

ATTORNEYS AT LAW

811 University Drive, State College, Pennsylvania 16801-6699
2601 Market Place, Suite 120, Harrisburg, Pennsylvania 17110

814-238-4926 FAX 814-234-5620
717-651-9844 FAX 717-651-9848
www.mcquaideblasko.com

Reply to State College

DIRECT: (814) 235-2235

May 24, 2000

Nathaniel B. Smith, Esquire
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648

RE: Cline vs. Road Runner Delivery, Inc.

Dear Mr. Smith:

On March 6, 2000, we filed Interrogatories for answer by your clients, together with a Request for Production of Documents. Would you please provide us with full and complete responses?

Very truly yours,

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

BY


JOHN W. BLASKO

JWB/nls

McQUAIDE, BLASKO, SCHWARTZ, FLEMING & FAULKNER, INC.

John W. Blasko Thomas E. Schwartz Grant H. Fleming R. Mark Faulkner David M. Weixel Steven S. Hurvitz James M. Horne Wendell V. Courtney Darryl R. Slimak Mark Righter Daniel E. Bright
Paul J. Tomczuk Janine C. Gismondi Maureen A. Gallagher John A. Snyder April C. Simpson Allen P. Neely Charles Eppolito, III Katherine V. Oliver Katherine M. Allen
Wayne L. Mowery, Jr. Pamela A. Ruest Michelle S. Katz Richard K. Laws Stacie Wagner Patterson Ashley Himes Kranich Chena L. Glenn-Hart

John G. Love (1893-1966) Roy Wilkinson, Jr. (1915-1995) Delbert J. McQuaide (1936-1997)

By: JOHN W. BLASKO
Attorney for Defendants

FILED

SEP 13 2000

SEP 11 27/1000
William A. Shaw
Prothonotary

WAS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREGORY E. CLINE and DIANE No. 00 - 75 CD
CLINE, husband and wife,

Plaintiff

vs.

ROAD RUNNER DELIVERY
SERVICE, INC., and JERRY GETER,
JR.,

Defendant

**NOTICE OF SERVICE OF PLAINTIFFS
ANSWERS TO DEFENDANTS
INTERROGATORIES AND REPLY TO
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET ONE AND SET TWO)**

Filed on behalf of:
Plaintiffs

Counsel of record for this party:

NATHANIEL B. SMITH, ESQUIRE

PA I.D. No. 34277

EDGAR SNYDER & ASSOCIATES, LLC
19 North Juniata Street
Suite 1, P.O. Box 536
Hollidaysburg, PA 16648-1901

(814) 696-6580

FILED

NOV 27 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband and
wife,

NO. 00 - 75 CD

Plaintiffs,

vs.

ROAD RUNNER DELIVERY
SERVICE, INC. and JERRY
GETER, JR.,

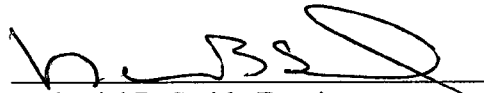
Defendants.

**NOTICE OF SERVICE OF PLAINTIFFS' ANSWERS TO DEFENDANTS
INTERROGATORIES AND REPLY TO REQUEST FOR PRODUCTION OF
DOCUMENTS
(SET ONE AND SET TWO)**

I hereby certify that on this 22nd day of November, 2000, Plaintiffs' Answers to
Defendants Interrogatories and Reply to Request for Production of Documents was mailed by First
Class Mail, postage prepaid, to counsel for the Defendants at the following address:

John Blasko, Esquire
McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.
811 University Drive
State College, PA 16801

EDGAR SNYDER & ASSOCIATES, LLC



Nathaniel B. Smith, Esquire
Attorney for Plaintiffs

FILED

NOV 27 2000

11:30 AM

William A. Shaw

Prothonotary

William A. Shaw
Prothonotary

FILED

JAN 30 2001

MA 6/10 CC
William A. Shaw
Prothonotary

WAS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband and wife
Plaintiffs

No. 00-75 CD

vs.

ROAD RUNNER DELIVERY SERVICE
INC., and JERRY GETER JR.
Defendant

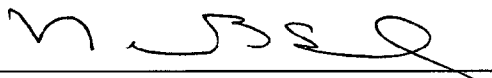
NOTICE OF DEPOSITION

To: Richard K. Laws, Esq.
McQuaide, Blasko, Schwartz, Fleming & Faulkner, Inc.
811 University Drive
State College, PA 16801-6699

PLEASE TAKE NOTICE that the Plaintiffs, Gregory E. Cline and Diane Cline, husband and wife, by their Attorneys, EDGAR SNYDER & ASSOCIATES, LLC, will take the telephone deposition of Jerry Geter, Jr., pursuant to Rule 4007, et seq., of the Pennsylvania Rules of Civil Procedure, as amended, before a court reporter duly authorized to administer oaths, on Thursday, May 31, 2001 at 2:00 p.m. eastern standard time. Jerry Geter will participate by telephone from his home at 4638 N. St. Louis Ave., Tulsa, Oklahoma 74126.

The deposition shall be taken before a Notary Public employed by Bryant Reporting of Tulsa, Oklahoma.

EDGAR SNYDER & ASSOCIATES, LLC

By 
Nathaniel B. Smith, Esq.
Attorney for Plaintiff

FILED

MAY 17 2001

61691.1

William A. Shaw
Prothonotary

notdepo.pf

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above **NOTICE OF DEPOSITION** was served on all Counsel of Record by First Class Mail, postage prepaid, on this 16th day of May, 2001.

Richard Laws, Esq.
McQuaide Blasko
811 University Drive
State College, PA 16801-6699

Bryant Reporting
1920 S. Gary Place
Tulsa, OK 74104

EDGAR SNYDER & ASSOCIATES, LLC

By Nathaniel B. Smith /lmw
Nathaniel B. Smith, Esq.
Attorney for Plaintiff

FILED

MAY 17 2001

MAY 14 1998

William A. Shaw

Prothonotary

[Signature]

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

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No. 00 - 75 C.D.

JURY TRIAL DEMANDED

NOTICE OF INTENT TO SERVE SUBPOENAS TO PRODUCE
DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT
TO RULE 4009.21

Defendants intend to serve subpoenas identical to the ones that are attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned any objections to the subpoenas. If no objections are made, the subpoenas may be served.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

Dated: 9-5-01

FILED

SEP 06 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

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No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Intent to Serve Subpoenas to Produce Documents and Things for Discovery Pursuant to Rule 4009-22 in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 5th day of September 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyders & Associates, L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

*

*

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: DUBOIS REGIONAL MEDICAL CENER

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

SEE ATTACHED

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

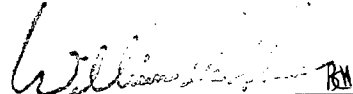
BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court

 BM

Deputy

Dubois Regional Medical Center

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: SCOTT CASTEEL, D.C.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws. Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court


Deputy

Scott Casteel, D.C./Casteel Chiropractic Center

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: Robert Landfried, D.O.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this
subpoena, together with the certificate of compliance, to the party making this request at the address
listed above. You have the right to seek in advance the reasonable cost of preparing the copies or
producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days
after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire
ADDRESS: 811 University Drive
State College, PA 16801
TELEPHONE: 814-238-4926
SUPREME COURT ID # 82369
ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court

William A. Shaw
Deputy

Robert Landfried, D.O.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: STANLEY LANG, M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

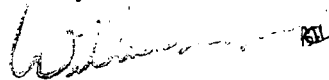
SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division



Deputy

DATE: Tuesday, September 04, 2001
Seal of the Court

Stanley Lang, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: MICHAEL-GERARD MONCMAN, D.O.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court


Deputy

Michael-Gerard Moncman, D.O.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

*

*

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: VINCENT MORGAN, M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office. 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court

Deputy

Vincent Morgan, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

*

*

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: MARK A. PIASIO, M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court


Deputy

Mark A. Piasio, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associ.
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court



Deputy

Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associates

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: P & G PHYSICAL THERAPY, INC.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this
subpoena, together with the certificate of compliance, to the party making this request at the address
listed above. You have the right to seek in advance the reasonable cost of preparing the copies or
producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days
after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court


Deputy

P&G Physical Therapy, Inc.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

FILED

SEP 06 2001

m j d : 10 1 m d c c
William A. Shaw
Prothonotary

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to P&G Physical Therapy, Inc. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901


McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001

m12381ncc
William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of
Records Deposition Directed to Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne
Matthews/Liberty Medical Associates in the above-captioned matter was mailed by regular mail,
postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of
September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 11 2001

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Mark A. Piasio, M.D. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001

William A. Shaw
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Vincent Morgan, M.D. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: Richard K. Laws

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 11 2001

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Michael -Gerard Moncman, D.O. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

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No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of
Records Deposition Directed to Stanley Lang, M.D. in the above-captioned matter was mailed by
regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7
day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901


McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001

m/238 hcc
William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.


JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Robert Landfried, D.O. in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 
Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001
m/a 381 no c
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of Records Deposition Directed to Scott Casteel, D.C./Casteel Chiropractic Center in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901


McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001

m12:38 PM
William A. Shaw
Prothonotary 

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

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No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Subpoena Duces Tecum and Notice of
Records Deposition Directed to Dubois Regional Medical Center in the above-captioned matter
was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on
this 7 day of September, 2001, to the attorney(s) of record:

Nathaniel B. Smith, Esquire
Edgar Snyder & Associates L.L.C.
19 North Juniata Street Suite 1
PO Box 536
Hollidaysburg, PA 16648-1901

McQUAIDE, BLASKO, SCHWARTZ,
FLEMING & FAULKNER, INC.

By: 

Richard K. Laws
Attorneys for Defendants
Road Runner Delivery Service, Inc. and
Jerry Geter, Jr.
811 University Drive
State College, PA 16801
(814) 238-4926
Fax: (814) 238-9624

FILED

SEP 10 2001
77638 NOCL
William A. Shaw
Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

GREGORY E. CLINE and
DIANE CLINE, husband wife,

Plaintiffs,

vs.

ROAD RUNNER DELIVERY SERVICE,
INC. and JERRY GETER, JR.,

Defendants.

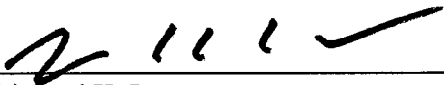
No. 00 - 75 C.D.

JURY TRIAL DEMANDED

CERTIFICATE PREREQUISITE TO SERVICE
OF SUBPOENAS PURSUANT TO RULE 4009.22

As a prerequisite to service of subpoenas for documents and things pursuant to Rule 4009.22, Defendants certify that:

- (1) a Notice of Intent to Serve the Subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party and the 20 day period was voluntarily waived;
- (2) a copy of the Notice of Intent, including the proposed subpoenas, is attached to this Certificate;
- (3) no objections to the subpoenas have been received; and,
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the Notice of Intent to Serve the Subpoenas.


Richard K. Laws
Attorney for Defendants

Dated: 9/17/01

FILED

SEP 17 2001

mla:38/no cc
William A. Shaw
Prothonotary

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22**

TO: DUBOIS REGIONAL MEDICAL CENR

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

SEE ATTACHED

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws. Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court


Deputy

Dubois Regional Medical Center

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: SCOTT CASTEEL, D.C.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws. Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court

Deputy

Scott Casteel, D.C./Casteel Chiropractic Center

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

*

*

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: Robert Landfried, D.O.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this
subpoena, together with the certificate of compliance, to the party making this request at the address
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producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days
after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire
ADDRESS: 811 University Drive
State College, PA 16801
TELEPHONE: 814-238-4926
SUPREME COURT ID # 82369
ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court



Deputy

Robert Landfried, D.O.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

Deputy

Stanley Lang, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: MICHAEL-GERARD MONCMAN, D.O.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court

Deputy

Michael-Gerard Moncman, D.O.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: VINCENT MORGAN, M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office. 811 University Drive, State College, PA 16801

(Address)

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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court

BA
Deputy

Vincent Morgan, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

*

Vs.

*

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

*

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: MARK A. PIASIO, M.D.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801

(Address)

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THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws. Esquire

ADDRESS: 811 University Drive
State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court

Deputy

Mark A. Piasio, M.D.

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associ.
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Richard K. Laws, Esquire
ADDRESS: 811 University Drive
State College, PA 16801
TELEPHONE: 814-238-4926
SUPREME COURT ID # 82369
ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw
Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001
Seal of the Court

6
Deputy

Dr. Martin Schaeffer/Dr. Kelly B. Schaeffer/Dr. Anne Matthews/Liberty Medical Associates

DOCUMENTS TO BE PRODUCED

Any and all medical records, **for as far back as you retain same**, pertaining to Gregory E. Cline (40 years of age as of February 2001), including but not limited to, emergency room records, history/physical examinations, discharge summary/notes, progress notes, operative reports, pathology reports, consultation reports, laboratory test results (inpatient and outpatient), x-ray/MRI/CT scan reports (inpatient and outpatient), myelograms, doppler studies, arteriograms, electrodiagnostic study results, physical/occupational/rehabilitation therapy progress notes (inpatient and outpatient), prescriptions, prognosis for full recovery, future care requirements, any and all correspondence (regardless of source) pertaining to patient's health care status, etc.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

Gregory E. Cline
Diane Cline
Plaintiff(s)

Vs.

Road Runner Delivery Service, Inc.
Jerry Jr. Geter
Defendant(s)

No. 2000-00075-CD

SUBPOENA TO PRODUCE DOCUMENTS OR THINGS FOR DISCOVERY PURSUANT TO RULE
4009.22

TO: P & G PHYSICAL THERAPY, INC.

(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the Court to produce
the following documents or things:

see attached

McQuaide Blasko Law Office, 811 University Drive, State College, PA 16801
(Address)

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NAME: Richard K. Laws, Esquire

ADDRESS: 811 University Drive

State College, PA 16801

TELEPHONE: 814-238-4926

SUPREME COURT ID # 82369

ATTORNEY FOR: Defendants

BY THE COURT:

William A. Shaw

Prothonotary/Clerk, Civil Division

DATE: Tuesday, September 04, 2001

Seal of the Court


Deputy

P&G Physical Therapy, Inc.

DOCUMENTS TO BE PRODUCED

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William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Gregory E. Cline
Diane Cline

Vs.

No. 2000-00075-CD

Road Runner Delivery Service, Inc.
Jerry Jr. Geter

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on January 16, 2002 marked:

Settled, Ended, and Discontinued with Prejudice.

Record costs in the sum of \$80.00 have been paid in full by Nathaniel B. Smith, Esquire.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 16th day of January A.D. 2002.

William A. Shaw, Prothonotary

FILED

JAN 16 2002

M 3:31 PM
William A. Shaw
Prothonetary

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